



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: AUG 29 2017
SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Schnitzer Northeast., Attleboro, Massachusetts
FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)
THRU: Nathan Frank, Section Chief
AECAB (IL/IN)
TO: File

BASIC INFORMATION

Facility Name: Schnitzer Northeast

Facility Location: 136 Bacon Street, Attleboro, MA 02703

Date of Inspection: July 28, 2017

EPA Inspectors:

1. Scott Connolly, Environmental Engineer, US EPA
2. Steve Rapp, Chief, Air Technical Unit, US EPA

Other Attendees

1. Louis Gois, Facilities and Operations Manager, Schnitzer Northeast
2. Keri Fitzpatrick, Regional Environmental Manager, Schnitzer Northeast (phone)

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Metal Recycling Facility

Regulations Central to Inspection: 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reductions

Arrival Time: 2:12 am EST

Departure Time: 3:35 pm EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Louis Gois unless otherwise noted.

Process Description:

Schnitzer Northeast in Attleboro is a scrapyard that accepts various post-consumer and industrial ferrous and non-ferrous metals. The facility sorts white good, appliances, demolition metal waste, and other metals into piles of like material. The facility has ferrous and non-ferrous metal sorting areas. Non-ferrous metal is removed from the light iron pile before the majority ferrous material is loaded onto trucks for transport to another Schnitzer metal shredding facility, e.g., the Schnitzer facility in Everett, MA.

Staff Interview: Facility staff stated that they only accept vehicles and appliances that have been completely cleaned of fluids. The facility does not have an ODS recovery machine. Schnitzer does, however, have one contract to accept vending machines that contain refrigerant. Interstate Refrigerant Recovery recovers refrigerant from the vending machines on site approximately 1 – 2 times per month. The facility requires all customers, including peddlers, as well as regular customers, to sign a Hazardous Materials Removal Compliance Contract (HMCC) that contains a certification that refrigerants have been removed from all scrap loads.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Air conditioning units and appliances were observed in the scrap metal piles, but it is unknown if they had been properly drained or evacuated. The facility had recently received a large number of soft drink vending machines. It appeared that the vending machines were drained on the day of inspection and orange stickers were placed on each item that was properly drained.

Field Measurements: were not taken during this inspection.

Photos and/or Videos: were taken during the inspection.
Photo Log is contained in Appendix A of this Inspection Report

RECORDS REVIEW


1. CFC Certification from Interstate Refrigerant Recovery (obtained one copy)

- a. Form states that all CFC's have been removed from 88 refrigerators on 7/28/17
2. Hazardous Materials Removal Compliance Contract (obtained one copy)
 - a. Filled out form that customers are required to sign when selling scrap to Schnitzer.
 - b. States that Refrigerants, PCB containing small capacitors, and mercury switches have been removed from all items.
 - c. Has address date and signature of the customer
3. Bill of Lading (BOL) Addendum: Mercury Certification for Light Iron and Vehicle Transactions
 - a. Certification of removal of Mercury components from vehicles and appliances

CLOSING CONFERENCE

Concerns: The facility makes every customer sign a contract stating that they have removed refrigerants from all items, but does not require any additional information. Customers that bring whole refrigerators or other appliances containing refrigerant are still required to sign that they have removed refrigerants even though these items have not been drained.

SIGNATURES

Lead Inspector:  Date: 8/18/17

Section Chief:  Date: 8/29/17

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APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log
2. Appendix B: Field Notes

Facility Name: Schnitzer Northeast
Facility Location: 136 Bacon Street, Attleboro, MA
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APPENDIX A: DIGITAL IMAGE LOG

<p>1. Photographer Name: Steve Rapp</p>	<p>2. Archival Record Location: https://usepa-my.sharepoint.com/personal/connolly_scott_epa_gov/_layouts/15/guestaccess.aspx?guestaccesstoken=Uapt6XNi00vYr8qBh5r1Iqvok0RGQfG%2fgq1%2bup7qYIY%3d&folderid=2_0baf5bcbbdb1462389430b5e186966e0&rev=1</p>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0807	July 28, 2017 at 14:45	Data not available	Overview of the non-ferrous sorting area of the yard. Two bailers are visible
2	IMG_0808	July 28, 2017 at 14:46	Data not available	Stationary Bailer on left side of the yard.
3	IMG_0809	July 28, 2017 at 14:46	Data not available	Stationary Bailer on right side of the yard
4	IMG_0810	July 28, 2017 at 14:47	Data not available	Light iron pile in ferrous sorting area
5	IMG_0811	July 28, 2017 at 14:48	Data not available	Refrigerators located in light iron pile
6	IMG_0812	July 28, 2017 at 14:48	Data not available	Vending machines located in ferrous sorting area
7	IMG_0813	July 28, 2017 at 14:49	Data not available	Orange labels indicating that CFC's have been recovered
8	IMG_0814	July 28, 2017 at 14:49	Data not available	Vending machines located in ferrous sorting area. Refrigerants appear the have been drained.
9	IMG_0815	July 28, 2017 at 14:50	Data not available	Vending machines located in ferrous sorting area
10	IMG_0816	July 28, 2017 at 14:51	Data not available	Cars located in light iron pile
11	IMG_0817	July 28, 2017 at 14:51	Data not available	Refrigerators located in light iron pile
12	IMG_0818	July 28, 2017 at 14:52	Data not available	Refrigerators located in light iron pile
13	IMG_0819	July 28, 2017 at 14:52	Data not available	Refrigerator located in light iron pile
14	IMG_0820	July 28, 2017 at 14:52	Data not available	Refrigerator located in light iron pile
15	IMG_0821	July 28, 2017 at 14:53	Data not available	Light iron and white goods scrap pile
16	IMG_0822	July 28, 2017 at 14:55	Data not available	Schintzer metal transport truck
17	IMG_0823	July 28, 2017 at 15:11	Data not available	Prohibited Materials sign at the entrance to the scales

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APPENDIX B: FIELD NOTES

See attached for Field Notes from EPA inspectors Scott Connolly and Steve Rapp and for obtained documents